

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THADDEUS SALEEM SHAHEED, et al.,

Plaintiffs,

v.

CITY AND COUNTY OF SAN
FRANCISCO,

Defendant.

Case No. [22-cv-06013-JSW](#)

**NOTICE OF QUESTIONS FOR
HEARING**

Re: Dkt. No. 279

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD, PLEASE TAKE NOTICE
OF THE FOLLOWING QUESTIONS FOR THE HEARING SCHEDULED ON NOVEMBER
21, 2025, AT 9:00 A.M.:

The Court has reviewed the parties' briefs and, thus, does not wish to hear the parties
simply restate the arguments raised in those briefs. In addition, the parties shall not file written
responses to this Notice of Questions for Hearing.

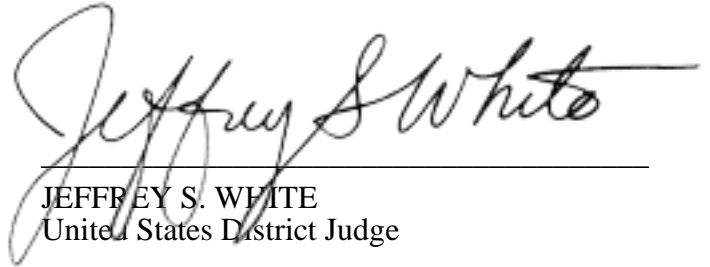
If the parties intend to rely on legal authorities not cited in their briefs, they must notify the
Court and opposing counsel of these authorities by 4:00 p.m. on Wednesday, November 19, 2025.
If the parties submit such additional authorities, they are ORDERED to file citations to the
authorities only, with pin cites and without argument or additional briefing. The parties will be
given the opportunity at oral argument to explain their reliance on such authority.

The Court suggests that associates or of counsel attorneys who are working on this case be
permitted to address some or all of the Court's questions.

1. In what way is this case distinguishable from the *Keene* decisions by the Ninth Circuit requiring plaintiff to be reinstated to his former position? The Court is not concerned with Plaintiff's previous disciplinary record as it is tasked merely with the decision whether to reinstate the status quo ante.
2. Does the delay in filing for an injunction lead to a finding of lack of irreparable harm? *See, e.g., Oakland Tribune, Inc. v. Chronicle Pub. Co.*, 762 F.2d 1374, 1377 (9th Cir. 1985) ("Plaintiff's long delay before seeking a preliminary injunction implies a lack of urgency and irreparable harm.").
3. What public interest would be served by reinstating Plaintiff to his former position and what public interest would be served by not reinstating Plaintiff to his former position?
4. Do the parties have anything further they wish to address?

IT IS SO ORDERED.

Dated: November 17, 2025



JEFFREY S. WHITE
United States District Judge